

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ROSS UNIVERSITY SCHOOL OF
MEDICINE, LTD.,

Plaintiff,

- against -

BROOKLYN-QUEENS HEALTH CARE,
INC. AND WYCKOFF HEIGHTS MEDICAL
CENTER,

Defendants.
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: 09 Civ. 1410 (KAM) (RLM)
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: **AFFIDAVIT IN SUPPORT OF**
: **SUBSTITUTION OF**
: **COUNSEL FOR**
: **DEFENDANTS**
:
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:

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

Walter P. Loughlin, being duly sworn, deposes and says:

1. I am a member of the bar of the United States District Court for the Eastern District of New York and a partner of the law firm K&L Gates LLP, located at 599 Lexington Avenue, New York, New York 10022. I submit this affidavit pursuant to Local Civil Rule 1.4 in support of the substitution of K&L Gates LLP as attorneys of record for Defendants Brooklyn-Queens Health Care, Inc. and Wyckoff Heights Medical Center (together, "Defendants").

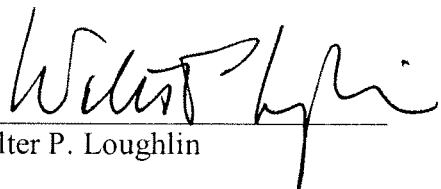
2. Defendants have appeared in this action through attorneys Ronald Daniel Lefton and Serena Boscia Montalbano of Greenberg Traurig LLP, located at 200 Park Avenue, New York, New York 10166 ("Greenberg Traurig").

3. I respectfully submit this Affidavit in support of the substitution of K&L Gates LLP for Greenberg Traurig. Attached hereto as Exhibit A is a Stipulation and proposed Order for Substitution of Counsel, duly signed by Greenberg Traurig LLP and K&L Gates LLP.

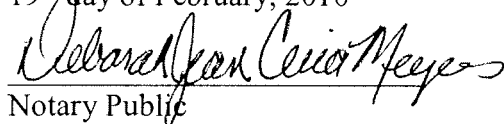
4. This case is at an early stage. The Second Amended Complaint in this matter was filed only five months ago, on September 22, 2009 and Defendants' Answer was filed only four months ago, on October 6, 2009. No motions have been filed.

5. I am familiar with the discovery schedule in this case. I am conferring with Greenberg Traurig and Plaintiffs' counsel to ensure that the substitution of counsel does not result in undue delay.

Dated: New York, New York
February 19, 2010


Walter P. Loughlin

Sworn to before me this
19th day of February, 2010


Notary Public

DEBORAH JEAN CERIA MEYERS
Notary Public, State of New York
No. 31-4831744
Qualified in New York County
Commission Expires September 30, 2011